



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

APR 30 2014

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL: 7009 1680 0000 7663 8586
RETURNED RECEIPT REQUEST

Mr. William Burke
Raybestos Powertrain, LLC
f/k/a Friction Holdings, LLC
1204 Darlington Avenue
Crawfordsville, Indiana 47933

Re: Risk-Based PCB Cleanup and Disposal Approval - 40 CFR § 761.61(c)
1204 Darlington Avenue, Crawfordsville, Indiana
IND 006 061 477

Dear Mr. Burke:

This letter is in response to the Raybestos Powertrain, LLC September 13, 2013 TSCA (Toxic Substances Control Act) Risk-Based Disposal Approval Application for proposed Polychlorinated Biphenyl (PCB) cleanup at Segment 2, Segment 3, and Segment 4 of the former sewer line at 1204 Darlington Avenue in Crawfordsville, Indiana.

The Application describes the prior in-place abandonment of reinforced concrete pipe (RCP) and an associated distribution box, along with the results of samples collected to justify the cleanup and disposal of PCB remediation wastes at the site in accordance with the requirements of 40 CFR § 761.61(c). The Application was submitted as an option for closure under the Statement of Work for TSCA Injunctive Relief, prepared in connection with the Consent Decree (DOJ No. 90-5-2-1-07285) between the U.S. Department of Justice and Friction Holdings, dated July 25, 2009, and constitutes a request for Risk-Based PCB Cleanup. Approval for risk-based on-site disposal of PCBs is being requested under 40 CFR § 761.61(c) because the impacts are related to a former sewer and because sampling of the abandoned in-place concrete sewer was not performed.

The Application describes that Segment 2 of the former sewer pipe consists of a 140-foot section of 18-inch RCP located directly upgradient from a removed section of pipe at the outfall of Shelly Ditch on the western side of the property. The RCP was grouted in-place and sealed with concrete in September 2001, following the submittal of Removal Work Plan Amendment #2 dated July 27, 2001. All work plans and modifications were approved by EPA on October 14,

2010. Segment 3 consists of a 220-foot section of 18-inch RCP located directly upgradient and to the south from Segment 2 that was abandoned in place by filling with concrete in 1999 and was not required to be closed under the Consent Decree. Segment 4 consists of a collapsed-in-place former distribution box, and in-use metal sewer pipe that previously joined the former RCP system between Segments 2 and 3. The distribution box and piping were cleaned in 1996, and the distribution box was disconnected from the RCP and crushed in-place at that time. The pipe connected to the distribution box from the utility tunnel was connected to the new sewer line located 20-feet west of Segments 2 and 3 of the former RCP sewer line.

The Application indicates that soil sampling along the three segments of the former RCP was performed in November 2010, in accordance with a TSCA Work Plan dated April 22, 2010. PCBs were found in two of the four samples composited from eight borings at the distribution box at 0.34 milligrams per kilogram (mg/kg, or parts per million-ppm) and 61.4 mg/kg. PCBs were also found in one of six composite samples from 20 soil borings installed along Segment 2 of the RCP at 0.065 mg/kg (sample 100' Composite Fill 2 J-R), and one of two composite samples from nine borings installed along Segment 3 of the RCP at 0.16 mg/kg (sample 220' Composite Fill). Both of the samples along Segment 2 and Segment 3 of the RCP in which PCBs were detected were composite samples collected from the fill for the former sewer line and, PCBs were not found in native soils along those segments. All soil samples are below the cleanup levels for low occupancy areas with caps, as specified under 40 CFR § 761.61(a)(4)(i)(B)(3).

At the request of EPA, confirmation wipe sampling was performed to evaluate PCB concentrations on the in-use metal pipe between a utility tunnel and the current sewer near the former distribution box that was previously connected to the impacted sewer system. Sampling results in the Application revealed concentrations of Aroclor 1248 of 29.7 $\mu\text{g}/100\text{ cm}^3$ and 9.3 $\mu\text{g}/100\text{ cm}^3$ in the two samples collected. Both concentrations are below the cleanup criteria for non-porous surfaces in low occupancy areas, as specified under 40 CFR § 761.61(a)(4)(ii). Remaining below ground portions of the utility tunnel are being addressed through decontamination and sampling under a TSCA Completion of Work Report (Report) prepared for the Consent Decree.

The Application includes a draft deed restriction that requires the maintenance of concrete and/or asphalt engineered barriers above impacted materials. The Application indicates that the areas of the former RCP segments and distribution box at the site are limited to low occupancy use and that this restriction will be recorded on the final deed restriction. Removal of the barrier or closed in-place RCP is not permitted under the deed restriction without notification to the Indiana Department of Environmental Management (IDEM) and EPA. The RCP is presumed to be impacted based on concentrations in the soil, and must be managed for disposal as PCB remediation waste in accordance with 40 CFR § 761.61(a)(5)(i)(B) if removed in the future.

Following EPA's review of the September 13, 2013 TSCA Risk-Based Disposal Approval Application, EPA approves the Application under 40 CFR §761.61(c) subject to the following conditions. Specifically, Raybestos Powertrain, LLC:

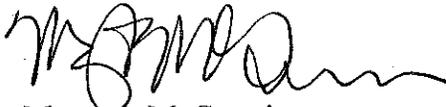
1. will use $\leq 100\text{ mg/kg}$ and $\leq 100\text{ }\mu\text{g}/100\text{ cm}^2$ as the cleanup objectives for total PCBs;

2. will file a deed restriction limiting the area of the distribution box and Segment 2, Segment 3, and Segment 4 of the RCP to low occupancy use as defined in 40 CFR § 761.3, to address residual PCB impacts that will remain in the soil below a cap at levels >25 ppm and ≤100 ppm following remediation. Although an industrial zoning restriction and potable groundwater use restriction are currently in-place for the site, a deed restriction that limits occupancy in such areas to less than 6.7 hours per week will be necessary at the completion of cleanup activities, pursuant to 40 CFR § 761.61(a)(8). The deed notice must be recorded within 60 days of completion of the cleanup, and will notify any potential purchaser of the property in perpetuity that the land has been used for PCB remediation waste disposal and is restricted to use as a low occupancy area, in addition to identifying the applicable cleanup levels; and,
3. will install a cap meeting the requirements of 40 CFR § 761.61(a)(7) and 40 CFR § 761.61(a)(8) to address areas of residual PCBs at concentrations > 25 ppm and ≤100 ppm, pursuant to 40 CFR § 761.61(a)(4)(i)(B)(3).
4. will provide a summary report that describes how you conducted the cleanup in accordance with this approval within 60 days after the completion of the cleanup.

Please note that this approval does not relieve you from your duty to comply with applicable federal, state, and local requirements or the July 25, 2009 Consent Decree. Any departure from the conditions of this approval or the provisions of the September 13, 2013, Application must receive prior written authorization from this office. All conditions of this approval and other applicable requirements of TSCA and its implementing regulations will continue to apply to the Site after any transfer in ownership.

If you have any questions, please contact Joseph Kelly, the Corrective Action Project Manager, by e-mail at Kelly.Joseph@epa.gov or by telephone at (312) 353-2111.

Sincerely,



Margaret M. Guerriero
Director
Land and Chemicals Division

cc: George Ritchotte, IDEM
R. Scott Powell, Lee & Ryan

